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Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren Uyenoyama

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Cung Le, Nathan Quarry, and Jon Fitch, on behalf of themselves and all others similarly situated,

Case Nos. 5:14-cv-05484-EJD, 5:14-cv-05591-EJD, 5:14-cv-05621-EJD; 5:15-cv-00521-EJD; 5:15-cv-01324-EJD

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

**DECLARATION OF PLAINTIFF KYLE
KINGSBURY IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO TRANSFER
VENUE**

Defendant.

5:14-cv-05484-EJD, 5:14-cv-05591-EJD
5:14-cv-05621-EJD, 5:15-cv-00521-EJD
5:15-cv-01324-EJD

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

1

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Kyle Kingsbury and Darren Uyenoyama, on behalf of themselves and all others similarly situated,

Plaintiffs,

V.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

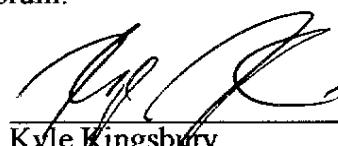
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5:15-cv-01324-EJD

1 I, Kyle Kingsbury, declare that I am more than 18 years of age and I am competent to testify
2 about the subjects declared herein, and that under the penalty of perjury, the following declarations
3 are true and correct and based on my personal knowledge:

- 4 1. I am an Elite Professional MMA Fighter and proposed representative of the Bout and
5 Identity Classes in the above-captioned matter. Along with Co-Plaintiff Darren
6 Uyenoyama, I filed the complaint in the above-captioned *Kingsbury et al. v. Zuffa*
7 *LLC*, No. 3:15-cv-01324, on March 20, 2015.
- 8 2. I currently reside in this District in Sunnyvale, California.
- 9 3. I competed in UFC-promoted bouts in the United States from December 2008 to July
10 2014. Specifically, I competed in “UFC 139” on November 19, 2011, and UFC on
11 Fox 12” on July 26, 2014 at the HP Pavilion (currently the “SAP Center”) in San
12 Jose, California.
- 13 4. Along with residing and fighting in San Jose, California, I consistently trained for
14 MMA bouts in San Jose.
- 15 5. My compensation for participation in UFC bouts was artificially suppressed due to
16 the anticompetitive scheme alleged in the complaint.
- 17 6. I appeared in Topps Trading Card sets, including a series in 2012, which are still sold
18 today.
- 19 7. My identity was expropriated and my compensation for appearing in UFC Licensed
20 Merchandise and UFC Promotional Materials was artificially suppressed.
- 21 8. I was and continue to be injured as a result of the UFC’s unlawful conduct.
- 22 9. I chose to file the above-captioned matter in this District because it was by far the
23 most convenient forum to pursue my antitrust claim. I reside with my family and
24 continue to train in this District, making it the most convenient forum for me to
25 litigate this action. It would produce considerable hardship to be called to testify in
an alternative, out-of-state forum.

26 Dated: April 10, 2015

27 By:



28

Kyle Kingsbury

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